

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

IN RE:

Case No:15-44731
Chapter 13
Hon: TUCKER

Whitney/michael & Kim

Debtor(s).

CHRISTOPHER E. FRANK (P67169)
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Attorney for Creditor
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James Frego
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OBJECTION TO CONFIRMATION

NOW COMES, Credit Union ONE, by and through its attorneys, The Leduc Group, and for its Objection to Confirmation of the Debtor's Chapter 13 Plan, states as follows:

1. That Debtors Chapter 13 Plan proposes to treat the 2009 GMC Sierra vehicle as a "cram down" claim in the amount of \$4,500.00.
2. Debtor's testified at the First Meeting of Creditors that the vehicle is worth between \$18,000-\$20,000.
3. According to the NADA value, similar trucks with 45,000 miles on it are worth at least \$18,500.
4. Debtor has failed to include treatment of the second loan with the Credit Union that is cross collateralized on the truck and is fully secured.

WHEREFORE, Credit Union ONE, requests this Court to deny the Debtor's confirmation of the Chapter 13 Plan.

Dated: May 12, 2015

By: /S/ Christopher E. Frank
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PROOF OF SERVICE

On the May 12, 2015, a copy of the Objections to confirmation of the Chapter 13 Plan ,and this Proof of Service were served electronically or by first class mail to the following:

Tammy Terry, Trustee

James Frego, Debtor Counsel

Whitney/michael & Kim
30 Manatee Ave
Hazel Park MI, 48030

/s/ Christopher E. Frank
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